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MARSHALL A. MINTZ

ANGELA D. LIPSMAN (NY; NJ)

November 22, 2022

Judge Hector Gonzalez
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: U.S. v. Theodore Persico
21 CR 466 (HG)

Dear Judge Gonzalez,

We represent Defendant Theodore Persico ("Persico"), who is detained at the Metropolitan Detention Center. We have conferred with counsel for Mr. Persico's co-defendants, and some of them are interested in having a co-defendant meeting with Mr. Persico at the courthouse. As the Court is aware, the subject matter of holding a co-defendant meeting at the courthouse was presented to the Court at the last status conference, at which time, counsel pledged to confer with the U.S. Marshals to that end. To remind the Court, a meeting at the courthouse is the preferred method for a co-defendant meeting (since a meeting at the Metropolitan Detention Center between detained defendants and defendants on location monitoring would, in addition to having to go through MDC Legal, require counsel for defendants on location monitoring to apply to the Court for an order to have Pretrial Services temporarily remove those defendants' monitors, and then have Pretrial Services re-attach the monitoring devices after any meeting at the MDC).

We have conferred with the U.S. Marshals Service, and we have been advised that it is difficult for the Marshals to have inmates moved absent a scheduled status conference.

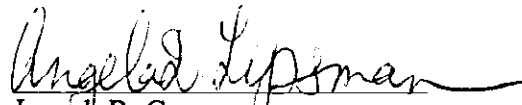
Wherefore, we respectfully request that the Court schedule a status conference for the following defendants: Theodore Persico, Richard Ferrara, Ralph DiMatteo, Joseph Bellantoni, Michael Uvino, Benjamin Castellazzo, and Erin Thompkins for December 14 in the late morning or early afternoon, for the sole purpose of facilitating a co-defendant meeting for these defendants.

In the alternative, if the Court schedules the status conference for all defendants, we respectfully request that the Court excuse the following defendants from the conference: Mr. Alimena, Mr. Domenick Ricciardo, Mr. Vincent Ricciardo, Mr. John Ragano, Mr. John Glover, Mr. Thomas Costa, and Mr. Vincent Martino.

RUBINSTEIN & COROZZO, LLP

Thank you for your consideration.

Respectfully submitted,


Joseph R. Corozzo
Angela D. Lipsman

cc: A.U.S.A.s Devon Lash and James McDonald (via ECF)
U.S. Marshal Peter Lee (via email)